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March 25, 2015

Via ECF

Hon. George B. Daniels
United States District Judge
United State District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*,
Docket No. 04-CV-397 (GBD)(RLE) – **Post-Trial Briefs**

Dear Judge Daniels:

I write on behalf of Defendants in response to the Court's directive that the parties submit by March 25, 2015 a letter regarding a schedule for post-trial briefing. *See* Feb. 23, 2015 Trial Transcript at 3938:11-13. Defendants intend to file:

- A motion for judgment as a matter of law under Federal Rule of Civil Procedure 50(b); and
- A motion for new trial under Federal Rule of Civil Procedure 59(a) and/or to alter or amend the judgment under Federal Rule of Civil Procedure 59(e).

Given that the Court granted Defendants' oral motion for leave to file a 50 page brief in support of its motion under Federal Rule of Civil Procedure 50(b) (*see* Feb. 23, 2015 Trial Transcript at 3938:19-23.50), Defendants propose the following briefing schedule and page limitations:

1. Defendants shall file a consolidated brief not to exceed 50 pages in support of their motions under Federal Rules of Civil Procedure 50 and 59;
2. Within (14) days of the filing of Defendants' initial brief, Plaintiffs shall file a consolidated opposition brief not to exceed 50 pages; and

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3. Within seven (7) days of the filing of Plaintiffs' opposition brief, Defendants shall file a reply brief not to exceed 20 pages.

For the avoidance of doubt, this proposal is independent of Defendants' expectation to move to stay the judgment under Federal Rule of Civil Procedure 62.

We presented this proposal to counsel for Plaintiffs earlier today but do not yet know whether they consent to or oppose this proposal.

Respectfully submitted,

Squire Patton Boggs (US) LLP

A handwritten signature in black ink, appearing to read "G. A. Baloul", written in a cursive style.

Gassan A. Baloul

cc: All ECF Counsel